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MEMO ENDORSED

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September 22, 2022

Hon. Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Fabio Younes Arboleda and Armando Gomez
18 Cr 262 (VEC)

Hon. Valerie Caproni:

I am counsel for Fabio Simon Younes Arboleda, who is scheduled to be sentenced on October 13, 2022. Because there is an issue regarding whether Mr. Younes' guilty plea was knowingly and voluntarily entered, I respectfully request that Your Honor appoint counsel pursuant to the Criminal Justice Act to determine whether any further motion practice is necessary with respect to his guilty plea.

By no later than **September 28, 2022**, Defense counsel must provide the court, *in camera*, with the basis for the suggestion that Mr. Younes's plea may not have been entered knowingly and voluntarily.

Sincerely,

/s/

Donald J. Yannella, Esq.

SO ORDERED.

Valerie Cap
09/23/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE